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Attorney for Defendant,  
**THE TRAVELERS  
INDEMNITY COMPANY**

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

CARSON CITY, a consolidated municipality  
and political subdivision of the State of  
Nevada,

Plaintiff,

vs.

THE TRAVELERS INDEMNITY  
COMPANY, a Connecticut Corporation, ROE  
COMPANIES I-X, and DOE INDIVIDUALS  
I-X,

Defendants.

**CASE NO.: 3:22-cv-00006 LRH-CLB**

**STIPULATED MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT**

The Parties, by and through undersigned counsel, hereby jointly request that the Court extend the deadline by which Defendant shall have to respond to the Complaint. Plaintiff and Defendant stipulate as follows:

1. Plaintiff filed the Complaint in the First Judicial District court for the State of Nevada in and for Carson City on November 17, 2021.
2. Defendant was served on December 9, 2021.
3. Defendant's deadline for answering or otherwise responding to the Complaint was December 30, 2021.

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4. On December 23, 2021, given the holidays surrounding the response deadline, Defendant requested that Plaintiff agree to a thirty day extension to respond to the Complaint. On December 27, 2021, Plaintiff agreed that Defendant may have an additional thirty (30) days to respond to the Complaint. Accordingly, the Parties agreed that Defendant may have until January 28, 2022 to respond to the Complaint.

5. Defendant removed the case to this Court on January 7, 2022. ECF 1.

6. Despite the removal to federal court, the Parties wish to maintain their previously agreed deadline for Defendant to respond to the Complaint as January 28, 2022.

7. Plaintiff consents to the relief requested in this Stipulation.

**NOW THEREFORE**, in consideration of the facts set forth above, the parties hereby stipulate and agree as follows:

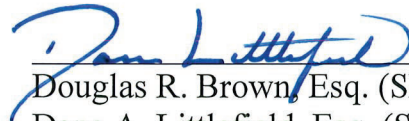
1. The deadline for Defendant to answer or otherwise respond to the Complaint shall be January 28, 2022; and

2. Defendant does not waive any defenses to the Complaint or its right to move to dismiss or otherwise move on the Complaint.

DATED: January 13, 2022

RAY LEGO & ASSOCIATES

LEMONS, GRUNDY & EISENBERG

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I-X,

Defendants.

**CASE NO.: 3:22-cv-00006 LRH-CLB**

**[PROPOSED] ORDER GRANTING STIPULATED MOTION TO EXTEND TIME TO  
RESPOND TO COMPLAINT**

Having consider the Stipulated Motion to Extend Time to Respond to Complaint  
("Stipulated Motion"), and for good cause shown, the Stipulated Motion is hereby  
GRANTED.

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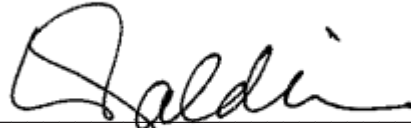
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1  
2 The deadline for Defendant to answer or otherwise respond to the Complaint shall  
3 be January 28, 2022. Defendant does not waive any defenses to the Complaint or its  
4 right to move to dismiss or otherwise move on the Complaint.

5 DATED this 13<sup>th</sup> of January, 2022.

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7 IT IS SO ORDERED.

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10 UNITED STATES MAGISTRATE JUDGE  
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